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BAQ Engineering Services Division

Company Name	Wilbert Plastic Services	Permit Writer:	Michael Robertson
Permit Number:	1880-0052.0tv	Date:	DRAFT

DATE APPLICATION RECEIVED: June 22, 2017**DATE OF LAST INSPECTION:** March 30, 2016 - No Violation Observed**FACILITY DESCRIPTION** Wilbert Plastic is a thermoforming and injection molding company.

The following processes permitted for this initial TV permit include the following:

Spray Painting

The facility incorporates the following three line painting processes and touch up area:

-EU14 Paint Line No. 1 (Manual)

Paint Line No. 1 consists of two paint booths for primecoat, two paint booths for basecoat, and one paint booth for clearcoat. All paint booths on Paint Line No. 1 are manual spray booths. Paints are mixed in a temperature controlled mix room and parts are wiped-down with alcohol to remove dust and finger-prints. After cleaning, the parts are hung on the conveyor line which moves through several paint spray booths where the various coatings are sprayed. After paint application; parts move along the conveyor system and are cured in a natural gas-fired convection cure oven.

-EU17 Paint Line No. 2 (Automated)

Paint Line No. 2 is equipped with three water wash spray paint booths for application of primecoat, basecoat, and clearcoat. The water wash booths are designed to collect overspray. Each booth includes two robots and paints are mixed in a small enclosed mix area with an exhaust fan. Prior to painting, parts are wiped-down with alcohol and treated in an enclosed room by flame treatment using an Enercon Dyne-A-Flame Surface Treating System.

Plastic parts run through the spray paint booths on a conveyor system. Each booth is supplied with two exhaust fans and pressured flash tunnels. After paint application, parts are cured in a natural gas-fired convection cure oven with two zones.

-EU16 Mini Paint Line

The mini paint line has one spray paint booth and natural gas dry off oven. Parts are manually painted in the spray booth as they move along a conveyor system and are dried in the oven.

-EU15 Touch-Up (Offline) Paint Booths

There are three paint booths used to touch-up parts. The booths are used intermittently for manual touch up and repairs. Two of the booths are fully enclosed and one is an open-faced booth with three sides. The open-faced booth is vented back inside the building.

PROJECT DESCRIPTION This is an initial TV permit.

CHANGES SINCE LAST OP ISSUANCE The facility recently went through an expansion resulting in the removal of equipment, updated process grouping, and flow diagrams for the permitted processes. The following changes were made to accommodate the modification.

- EU01 Five stage washer was removed from previously issued conditional major permit



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- Emission Unit 03, 04, 05, 06, 07, 08, 12, and 13 of the previously issued conditional major permit were listed as stand-alone process units; however, they are now grouped together as one process with updated equipment ids and labeled EU14 (Paint line No.1)
- Individual touch up booths were combined as one process and labeled EU15 (Touch-up booths)
- Emission Unit 02 and 09 of the previously issued conditional major permit have been repurposed and labeled (EU16) mini-paint line
- The facility also added a new Water Eater@ Evaporator model 125E, to evaporate mop water collected in the floor scrubber. This evaporator is exempt from construction permit requirements per section II.B.2.h
- The injection molding process (Exempt Source ID B); emission calculations were updated for injection molding due to the facility's expansion. The updated capacity to the existing exempt sources do not change the insignificant status or applicability of the sources (There are no stacks or direct ventilation, emissions are vented as fugitives inside the building)
- MA2 (Air Make-up Unit) from CP-CR previously listed as 5.5 million Btu/hr, corrected capacity to 5.4 million Btu/hr. MA1 and MA2 from CP-CR were moved to the Insignificant Activities list per B.1 (b)
- Insignificant Activity F (PSI Electric Air Tank) previously listed as 125 psi, corrected capacity to 200 psi

SOURCE TEST REQUIREMENTS None

SPECIAL CONDITIONS, MONITORING, LIMITS This facility's potential to emit exceeds 100 tpy for VOC, 10 tpy for a single HAP and 25 tpy for combined HAPs thus, becoming a major source for TV and MACT subjecting Wilbert Plastic Services to Subpart P-PPPP-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products.

The facility will comply with the NESHAP according to 63.4491(b), emission rate without add-on controls option. Wilbert will demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operations, the organic HAP emission rate for the coating operations is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. The requirements of 63.4550, 63.4551, and 63.4552 will be followed to demonstrate compliance with the emission limit using this option.

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled/Limited Emissions
	TPY	TPY
PM	355.305	15.729
PM ₁₀	245.543	14.631
PM _{2.5}	224.963	14.426
VOC	702.048	< 250
Xylene	145.490	145.490
Toluene	93.136	93.136
Glycol Ethers	56.916	56.916
Ethyl Benzene	49.574	49.574
MIBK	37.494	37.494
MEK	320.62	320.62
Methyl Methacrylate	0.407	0.407



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FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled/Limited Emissions
	TPY	TPY
HDI	0.539	0.539
Cumene	0.175	0.175
Phenol	1.362	1.362
Naphthalene	0.289	0.289
Highest Single HAP CAS # 1330-20-7	145.490	145.490
Total HAPs	386.523	386.523

OPERATING PERMIT STATUS This facility currently operates in accordance with Conditional Major Permit No.1880-0052, this permit expired December 31, 2014. Wilbert Plastic submitted an application to renewal this permit on September 30, 2014; however, in 2015 the facility requested to expand their facility through Synthetic minor construction permit CP-CR resulting in the need for a TV operating permit. At this time the facility is requesting their initial TV operating permit.

REGULATORY APPLICABILITY REVIEW	
Regulations	Comments/Periodic Monitoring Requirements
Section II.E – Synthetic Minor	The facility previously took synthetic minor limits (CP-CR) for PM, PM ₁₀ , and PM _{2.5} and VOCs to avoid PSD review.
Standard No. 1	There are no indirect fired sources; therefore, this standard does not apply.
Standard No. 3 (state only)	There is no waste combustion taking place; therefore, this standard does not apply.
Standard No. 4	Paint Line No. 1, Touch-up Booths, Mini Paint Line and Paint Line No. 2 each have opacity limit (including any fugitives) and Particulate Matter (PM) allowable emissions rates (based on a process weight rate in tons per hour) imposed by this standard.
Standard No. 5	The facility is not an existing process described under one of the parts of Section II of Standard 5, since the facility did not commence operation before July 1, 1979.
Standard No. 5.2	The fuel burning sources are not subject to the rule per section I (B) (1): Any source emitting NO _x listed on the Regulation 61-62.1, Section II(B).
Standard No. 7	The facility is not one of the 28 source categories defined in the PSD Regulations that have a threshold of 100 tpy; the threshold for emissions is 250 tpy for the facility and the facility established a limit of less than 250 tpy (CP-CR) for VOCs, PM, PM ₁₀ , and PM _{2.5} emissions to avoid PSD review.
61-62.6	This process is not anticipated to have fugitive PM (Dust) emissions.
40 CFR 60 and 61-62.60	Subpart TTT does not apply since the facility does not paint plastic parts for business machines.
40 CFR 61 and 61-62.61	The facility does not emit the pollutants subject to this standard (asbestos, benzene, beryllium, coke oven emissions, arsenic, mercury, radio nuclide, radon, or vinyl chloride).
40 CFR 63 and 61-62.63	40 CFR 60 Subpart PPPP: National Emission Standards For Hazardous Air Pollutants For Surface Coating Of Plastic Parts And Products. This regulation

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REGULATORY APPLICABILITY REVIEW

Regulations	Comments/Periodic Monitoring Requirements
	applies to this facility because the facility is a major source within the applicable category. The facility intends to meet the emission limit in 63.4490 through usage requirements in 63.4491(b) as well as compliance demonstration according to 63.4550, 63.4551, and 63.4552. 40 CFR 63, Subpart HHHHHH - Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources does not apply because the facility is a major source for HAPs
61-62.68	The facility does not use or store chemicals subject to 112(r) in quantities above applicable thresholds.
40 CFR 64 (CAM)	Uncontrolled emissions from each source is less than major source threshold; therefore, CAM does not apply.

AMBIENT AIR STANDARDS REVIEW

Regulations	Comments/Periodic Monitoring Requirements
Standard No. 2	This facility has demonstrated compliance through modeling; see modeling summary dated July 10, 2018.
Standard No. 8 (state only)	The facility is subject to MACT Standard (40 CFR 63, Subpart PPPP), therefore the facility is exempt from standard No. 8 per section I(D)

PUBLIC NOTICE This Title V Permit will undergo a 30-day public notice period and a 45-day EPA comment period in accordance with SC Regulation 61-62.1, Section II.N and SC Regulation 61-62.70.7(h). The comment period was open from August 13, 2018 to September 11, 2018 and was placed on the BAQ website during that time period.

SUMMARY AND CONCLUSIONS It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.